

IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NORTH CAROLINA
GREENVILLE DIVISION

IN THE MATTER OF:)	
)	CASE NO.: 19-00730-5-JNC
CAH ACQUISITION COMPANY 1, LLC)	
d/b/a WASHINGTON COUNTY HOSPITAL,)	CHAPTER 11
)	
DEBTOR.)	

OBJECTION TO PROPOSED SALE

Complete Business Solutions Group, Inc. (hereinafter "CBSG"), by and through counsel, hereby objects to the proposed sale by the Chapter 11 Trustee, pursuant to Section XII and paragraph 3 of Section XVI of that certain Order entered herein on November 27, 2019 (Doc #561). In support thereof, CBSG states that it is the owner of all accounts and contract rights of the Debtor as of the date of execution of each Factoring Agreement by the Debtor; or December 7, 2018 and December 10, 2018. These Factoring Agreements are set forth in the Proof of Claim previously filed herein (Claim #29-2). The Debtor is only entitled to sell property of the estate under 11 U.S.C. §363(f) and may not sell property that it does not own. Should the Court disagree with CBSG's position and allow the Trustee to sell the property under 11 U.S.C. §363(f), CBSG is entitled to an Order directing that any interest that CBSG has in the property sold be transferred to the proceeds of sale as such interest existed as of the petition date.

WHEREFORE, CBSG prays the Court as follows:

1. That the Court grant this Objection and deny the Trustee's Motion as it relates to the property owned by CBSG; and
2. That, alternatively, the Court enter an order that any interest that CBSG has in the property sold be transferred to the proceeds of the sale as such interest existed as of the petition date; and
3. That the Court hold a hearing hereon; and

4. For such other and further relief as the Court may deem just and proper.

This the 20 day of December, 2019.

HUTCHENS LAW FIRM LLP
Attorneys for Complete Business Solutions Group, Inc.

By: 

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CERTIFICATE OF SERVICE

I, William Walt Pettit, as attorney of record for Complete Business Solutions Group, Inc., hereby certify that on the 20 day of December, 2019, I served a copy of the Objection to Proposed Sale by either electronic notice in accordance with the local rules or by depositing the same, enclosed in a postpaid, properly addressed wrapper, in an official depository under the exclusive care and custody of the United States Postal Service, said envelope being addressed as follows:

CAH Acquisition Company 1, LLC
d/b/a Washington County Hospital
958 U.S. Highway 64 East
Plymouth, NC 27962

Rayford K. Adams, III
(by ECF service)

Thomas W. Waldrep, Jr.
U.S. Bankruptcy Administrator's Office
(by ECF service)

HUTCHENS LAW FIRM LLP
Attorneys for Complete Business Solutions Group, Inc.

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